

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MIKE HARRIS and JEFF DUNSTAN,
individually and on behalf of a class of
similarly situated individuals

Plaintiff,

v.

COMSCORE, INC., a Delaware corporation

Defendant.

CASE NO. 1:11-cv-5807

Chief Judge Holderman

Magistrate Judge Kim

DECLARATION OF ROBYN BOWLAND

I, Robyn Bowland, hereby declare and state based upon my personal knowledge as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan LLP. I am admitted to practice law in the state of Illinois and represent comScore, Inc. (“comScore”) in the above-titled action. This declaration is based on my personal knowledge, except where expressly noted otherwise.

2. A true and correct copy of a website entitled “comScore Fact Sheet – comScore, Inc.” available at http://www.comscore.com/About_comScore/comScore_Fact_Sheet, accessed on February 25, 2013, is attached as Exhibit A to this Declaration.

3. A true and correct copy of the Expert Witness Report of Colin O’Malley, dated November 30, 2012, is attached as Exhibit B to this Declaration.

4. A true and correct copy of excerpts of the deposition transcript of Michael Brown, dated August 15, 2012, is attached as Exhibit C to this Declaration.

5. A true and correct copy of the Expert Witness Report of Roberto Tamassia, dated November 30, 2012, is attached as Exhibit D to this Declaration.

6. A true and correct copy of CS0016873, an Excel spreadsheet produced by comScore in this case, is attached as Exhibit E to this Declaration.

7. A true and correct copy of excerpts of the deposition transcript of Colin O'Malley, dated December 13, 2012, is attached as Exhibit F to this Declaration.

8. A true and correct copy of excerpts of the deposition transcript of Roberto Tamassia, dated December 14, 2012, is attached as Exhibit G to this Declaration.

9. A true and correct copy of comScore's Second Supplemental Responses to Plaintiff Harris's First Set of Interrogatories, dated May 24, 2012, is attached as Exhibit H to this Declaration.

10. A true and correct copy of excerpts of comScore's Responses to Plaintiff Harris's First Set of Interrogatories, dated March 23, 2012, is attached as Exhibit I to this Declaration.

11. A true and correct copy of comScore's Fourth Supplemental Responses to Plaintiff Harris's First Set of Interrogatories, dated September 14, 2012, is attached as Exhibit J to this Declaration.

12. A true and correct copy of excerpts of the deposition transcript of Don Waldhalm, dated October 25, 2012, is attached as Exhibit K to this Declaration.

13. A true and correct copy of excerpts of the deposition transcript of Yvonne Bigbee, dated September 12, 2012, is attached as Exhibit L to this Declaration.

14. A true and correct copy of excerpts of the deposition transcript of Randall L. McCaskill, dated September 14, 2012, is attached as Exhibit M to this Declaration.

15. A true and correct copy of excerpts of the deposition transcript of Michiko A. Chand, dated September 13, 2012, is attached as Exhibit N to this Declaration.

16. A true and correct copy of excerpts of Plaintiff Mike Harris's Responses to Defendant comScore's First Set of Interrogatories, dated April 9, 2012, is attached as Exhibit O to this Declaration.

17. A true and correct copy of excerpts of the deposition transcript of Michael J. Harris, dated July 13, 2012, is attached as Exhibit P to this Declaration.

18. A true and correct copy of Exhibit 6 used during the deposition of Michael J. Harris on July 13, 2012, is attached as Exhibit Q to this Declaration.

19. A true and correct copy of the Declaration of Michael Brown, dated February 26, 2013, is attached as Exhibit R to this Declaration.

20. A true and correct copy of excerpts of Plaintiff Jeff Dunstan's Responses to Defendant comScore's First Set of Interrogatories, dated April 9, 2012, is attached as Exhibit S to this Declaration.

21. A true and correct copy of excerpts of Plaintiff Jeff Dunstan's First Supplemental Responses to Defendant comScore's First Set of Interrogatories is attached as Exhibit T to this Declaration.


22. A true and correct copy of Harris-Dunstan 0632-0655, an anti-virus log produced by Plaintiff Jeff Dunstan in this case, is attached as Exhibit U to this Declaration.

23. A true and correct copy of excerpts of the deposition transcript of Jeffrey Dunstan, deposed August 8, 2012, is attached as Exhibit V to this Declaration.

24. A true and correct copy of Ben Thomassen's email regarding Plaintiff Jeff Dunstan's anti-virus log (Harris-Dunstan 0632-0655) is attached as Exhibit W to this Declaration.

25. I hereby declare under the penalty of perjury that all statements made herein are true and correct.

Executed this 26th of February, 2013.



Robyn M. Bowland
Attorney for comScore, Inc.